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October 28, 2021

The Hon. U.S. District Judge Ronnie Abrams
Thurgood Marshall United States Courthouse
40 Foley Square
New York, NY 10007

Re: Hammond-Williams et al v. Fuchs et al, 21-cv-1121 (RA) – Final Extension Request

Dear Judge Abrams,

On behalf of Ms. Eddie B. Hammond, the undersigned requests one final extension to refile their Complaint in the above-referenced matter.

As Your Honor is aware, after filing my Notice of Appearance on September 15, 2021, the Court granted my extension request until November 1, 2021 to refile the Plaintiff's Complaint. Since that time, we have diligently sought, requested, and gathered documentation to support the legal elements of each prospective cause of action. Much of this documentation, including contractual paperwork, spans the course of two decades, and at times there have been delays in retrieving that paperwork, including with respect to some of the recent estate related documentation for Mr. Roy C. Hammond. Due to some outstanding documentation that we need to verify prior to bringing claims that could otherwise be summarily dismissed on a Rule 12(b)(6) motion, we are requesting one final extension to November 18, 2021 to refile the Complaint.

This request is made in good faith and without prejudice to the defense, as all potential claims considered fall squarely within the applicable statutes of limitations.

I thank Your Honor for your consideration.

Regards,

Phillip C. Hamilton

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